

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
WINCHESTER DIVISION

DEBRA BROWN, JEROME BELL,)	
CHARLES BROOKS, MICHAEL MCGUINN,)	
AND JASON SWEARINGTON,)	
)	
Plaintiffs.)	
vs.)	No. 4:05-CV-67
)	
COFFEE COUNTY, TENNESSEE; STEVE)	
GRAVES, Individually and in his)	
official capacity; PAMELA FREEMAN,)	
Individually; OFFICER TREY,)	
Individually; BRITNEY HODGES,)	
Individually; TERESA HULAN,)	
Individually, SGT. GENTRY,)	
Individually; KEITH SELLER,)	
Individually, LT. CHARLES BEATTY,)	
Individually; KAYRON BOWEN,)	
Individually; JONATHAN YOTT,)	
Individually; WADE FERRELL,)	
Individually; and JOHN DOE 1-5,)	
)	
Defendants.)	

Deposition of:

JOHN HANNA, JR.

Taken on Behalf of the Plaintiffs

January 17, 200

Bain, Cleeton & Evans
An Association of Court Reporters
212 Third Avenue North • Suite 201
Nashville, Tennessee 37201
Phone: (615) 255-6425

Reported By: LaVonne Cleeton, RMR, CRR

1 of problems.

2 Like I say, when I train -- I just came
3 out of a training class and we talked about that.
4 And we talk about that in -- I train throughout the
5 year. Just about every week I've got two or three
6 classes, basic and in-service, and we talk about
7 that.

8 Q. Do you do any training for correctional
9 officers in recognizing emergency medical
10 conditions?

11 A. We talk about the AMA stipulations that
12 say that certain types should not be let into a
13 jail, but that's administrative. We don't get into
14 administrative policies, but -- and then every jail
15 is supposed to have -- supposed to have medical
16 protocol assigned from a doctor to a nurse to the
17 jail to offset any emergency situation.

18 Q. So there's no specific classes that TCI
19 gives to corrections officers in Tennessee about
20 recognizing emergency medical conditions?

21 A. No, we don't.

22 Q. Was there a time that the Coffee County
23 Jail was decertified?

24 A. They were decertified last year. I
25 forget exactly when.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 that county that got the pursestrings that they're
2 holding onto them need to say we're going to do
3 something about it. We're going to get a
4 feasibility study and then we're going to take it
5 forward from point A to point B to point C,
6 whatever. That's the plan that -- No. 2.

7 And then we say let's -- I'll tell you
8 what we're going to do. And it's not me doing it.
9 It's the Board of Control. We're going to give them
10 time to bring this forth, and then we follow it up.

11 Q. And then your other X was
12 "overcrowded/county/state prisoners" and it says
13 "attach ADA calculations."

14 A. And that's what I was speaking of
15 earlier when I said ADA. Average daily attendance.
16 We take three months and we find out how many
17 Department of Corrections and how many -- and then
18 we subtract that. That's what I was speaking of
19 earlier.

20 Q. And let me tell you what puzzles me.
21 I've read your regulations and they -- TCI
22 regulations and they require so many showers per
23 inmate.

24 A. Right.

25 Q. So many toilets per inmate.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 A. Right.

2 Q. So many square footage of --

3 A. Right.

4 Q. -- space for each inmate.

5 A. Right.

6 Q. And these are minimum standards,
7 correct?

8 A. Right. Right.

9 Q. But if they have a lot of state
10 prisoners that the State is not taking, they don't
11 necessarily have to meet those standards?

12 A. Well, they have to meet them, but,
13 still, you have the bodies there that compromise
14 square footage. See, that's what we do. So we
15 just -- we still -- we can't count those as -- into
16 the general count, you see?

17 Q. It wouldn't be fair to do that --

18 A. Can't do that.

19 Q. -- if the State is not -- you're
20 inspecting and making these rules, but at the same
21 time the State Department of Corrections is not
22 taking the state prisoners fast enough?

23 A. Right. You see, it can't be held -- we
24 don't hold the jail accountable for the state
25 inmates. So we have to go on -- and it's just the

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 law. I've got it, but I don't have it -- I've got
2 it in my office. It says that these items should be
3 deducted from the overcrowding. That's where the
4 ADA comes in.

5 Q. But from the inmate standpoint, if the
6 minimum standards are the minimum required for
7 constitutional or decent housing --

8 A. Right.

9 Q. -- the inmate isn't getting that?

10 A. Right. If that's the case, right. And
11 then, you know, that's the reason they say I'm going
12 to sue. Then we talk about inmates' rights. Well,
13 that's constitutionally correct. They've got
14 institutional privileges, but they've got
15 constitutional rights and you can't violate -- if
16 you violate it, of course, you can be cited for some
17 tort.

18 Q. As a matter of fact, the Tennessee
19 Constitution requires that inmates be treated
20 humanely, doesn't it?

21 A. Oh, yes. Yes. And then we start
22 talking about -- what comes up is duty of care and
23 it's the jails's responsibility to provide for the
24 basic needs of inmates. And we're not talking about
25 something that's cosmetic, cosmetically appealing,

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 but we start talking about basic needs.

2 And then if it's -- that can't be a
3 violation if that's done. But if you neglect on
4 that, then you can be cited for a certain type of
5 negligence. It can be gross negligence, simple
6 negligence, whatever.

7 Jails know this. They know it, but if
8 they don't do it -- just like some of my jails, they
9 don't do what they're supposed to. They know, but
10 they just won't do it for whatever reason. I don't
11 know.

12 Q. Did Coffee County submit a plan based
13 on the overcrowding of county prisoners?

14 A. I think they submitted a form that said
15 that they're going to do this and they're going to
16 do that, and we followed it up, but like I say, I
17 don't have all those records at my disposal because
18 I didn't know this was going to come up. We were
19 going to try and wait and see what they were going
20 to do about, you know, the jail itself.

21 And when I go back -- you see, I'm
22 going back and inspect this year and see what
23 they're doing. They had the stipulation for the
24 shower. Put it like that. They didn't have enough
25 shower heads to oversee the shower problem in the

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 jail, and so they were putting in extra showers.

2 Okay. That's fine. But they haven't
3 given me a notification that this has been
4 completed, has been done. They say they was working
5 on it. So I'm in the process of going back
6 probably -- I can't next week because I've got a
7 class, but the following week I'm going to sneak
8 over there and just see if that's been done.

9 But then I have to look at some other
10 things because I probably will do an inspection, you
11 see. It's not really -- you see, we put down the
12 times that we inspect and we try to offset it each
13 year, but I might just change that around because
14 I'm not too sure about Coffee County. They need to
15 go ahead on and get that taken care of or they're
16 going to have some other problems in this area.

17 Q. How long have they been promising to
18 add shower heads?

19 A. Okay. Now, this was last year. The
20 last time I stopped by there -- actually, it's about
21 August, September I think I stopped by there and
22 they were in the process.

23 Q. Of 2006?

24 A. Right. If I'm not mistaken, that's
25 supposed to have been done by now, but I would like

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 to see it so I'll probably stop by.

2 Q. When you do your inspections of local
3 jails, do you notify the jails that you're going to
4 do the inspection?

5 A. No. Unannounced. No. We don't do
6 that. The only announced visit is the reinspection,
7 and then we go to look at specific things and then
8 we just look at the overall picture. But specific
9 things that were in noncompliance from the previous
10 initial inspection, that's the only one that we
11 announce. Initial inspection, unannounced.

12 Q. On your, I guess, next-to-last page
13 under "Classification" you've got a note about
14 unable to -- unless I've got them out of order
15 there. You've got a note: Unable to classify due
16 to the overcrowding of inmates.

17 A. Right. Wherever it is. Okay. Right.

18 Q. And you say: Recommend inmate/officer
19 life safety issues take priority when attempting to
20 classify inmates.

21 A. Right. Okay. When you start talking
22 about gender, age, prior record and all those
23 things, that's -- but when you're overcrowded it's
24 very hard to do that because sometimes you have
25 someone that's got a major felony classified with

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 someone that's got something for less a degree.

2 So, then again, you know, like I said,
3 overcrowding causes other problems. This is one of
4 them. Classification system. It goes out wide.

5 Q. And that's one of the minimum standards
6 published by the TCI, is classification of -- what
7 is it? Low, medium, and high-security inmates?

8 A. Right. That it should not be
9 compromised.

10 Q. And when you did your inspection here
11 in September of 2004, it was compromised, right?

12 A. Well, anytime you're overcrowded, it
13 seems like to me, you know, when I look through the
14 records, I see an inmate over here that's got a
15 major crime and he's housed with, you know -- it's
16 not against the law to house felons with
17 preadjudicated or whatever, but it's not a good
18 idea. It's not recommended.

19 So when you're overcrowded, it happens.
20 I mean, you don't have any choice because you don't
21 have anywhere to put them. And when you start
22 talking about a special needs cell, you talk about
23 medical, you talk about mental health, the jail's
24 not equipped to handle mental health types.

25 So then you have to do the best you

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 can, but then you find out who's got the life
2 security issues and then try your level best in that
3 regard to weed them out from the general population.

4 Q. The way that the Coffee County Jail has
5 been built, is there any way to separate out
6 prisoners with mental health issues?

7 A. Not -- they don't have the space, they
8 don't have the room, and that's the problem.

9 Q. And the same thing with violent
10 inmates?

11 A. Right. When we start talking about
12 maximum security, that needs -- we've got inmates,
13 the 13 gangs that they found a few 13 here not too
14 long ago, and they're infiltrating a lot of the
15 jails and people don't realize it, the officials
16 don't realize it because they're not really visible.
17 They're low-profile.

18 But all of a sudden when they start
19 acting up, then they act like STG. When we start
20 talking about STG, security threat groups that come
21 to the jail. Okay. Those individuals need to be
22 weeded out and really classified because they can
23 cause some problems, big problems in the jail.

24 Q. Now, in your summary of comments down
25 at the bottom, you say: Coffee County has outgrown

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 this facility.

2 A. Yes.

3 Q. You say: The condition of this jail
4 has vastly deteriorated since the 2003 inspection,
5 due in part to the influx of inmates.

6 A. Right. You see -- go ahead.

7 Q. And the jail staff is sure to see more
8 incidents of assault, escape attempts, riots, and
9 attempted inmate suicides. Correct?

10 A. Right.

11 Q. And you strongly recommended hiring
12 additional jail staff and/or reducing the inmate
13 population?

14 A. Right.

15 Q. And did Coffee County hire additional
16 jail staff or reduce the inmate population?

17 A. I don't -- they reduced the inmate
18 population, according to Pam Freeman, but hiring
19 additional staff is always a problem and I don't --
20 they might have lost a few. If you lose and then
21 hire, that's not hiring additional. You're right
22 back where you started.

23 Q. And is that a problem because of the
24 cost of hiring additional staff?

25 A. It's been known to happen. My last

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 class, this nurse came in. She had worked at River
2 Bend and she would -- they told me that she was not
3 available for comment the next day. She quit the
4 job because the money wasn't up to her expectation.
5 So a lot of times it's money. You know, they've got
6 families.

7 MR. BAUM: Mark that.

8 (Whereupon, the previously mentioned
9 document was marked Exhibit No. 2.)

10 Q. (BY MR. BAUM) Mr. Hanna, I'm going to
11 hand to you what's been marked for purposes of
12 identification as Exhibit No. 2. It starts with a
13 November 29th, 2004 letter from Mr. Abston to
14 Sheriff Steve Graves.

15 A. Uh-huh.

16 Q. This is where TCI notified Sheriff
17 Graves that the Coffee County Jail did not meet the
18 applicable minimum standards. In this one it says
19 that you had recommended certification pending the
20 Board of Control's review.

21 A. Right. Talking about I recommended.
22 Of course, now, they do what they do. But I
23 recommended it because they were really trying.
24 They were trying. And we talked about overcrowding,
25 which you can see it's not as many. They knocked it

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 down. And, you know, of course, they had 30 state.
2 Then, of course, everything has been knocked down
3 and they did try to, you know, relieve overcrowding.

4 But like I said before, this hiring of
5 extra staff, additional staff, I don't think
6 happened. But they don't let us know when they hire
7 new staff.

8 Q. While I'm looking back at Exhibit
9 No. 1, and it looks like between the first
10 inspection in September and this reinspection, that
11 the full-time staff stayed the same?

12 A. Right. But the population went down.

13 Q. Okay. But I see that, looking near the
14 bottom of Page 3, it says: Are you presently
15 renovating, constructing, or planning a new
16 detention facility? And that's been changed to
17 "yes."

18 A. Right. So that's one of the things
19 that they were looking into, but like I said, I
20 haven't had -- I told them to give me a progress
21 report and I don't know to what extent they've
22 followed through.

23 Q. Do you know, did Coffee County ever
24 secure any funding for a new facility?

25 A. Right. See, that would be in the

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 process, and I'm not aware of that.

2 Q. Are you aware of whether or not Coffee
3 County has ever engaged the services of an architect
4 to design a new jail?

5 A. I don't know. See, that would be part
6 of the process.

7 Q. You've got a note here on this same
8 page. I'm looking it's handwritten. "Corrections
9 attached." The population the day of inspection has
10 been crossed out.

11 A. Right. This looks like Peggy Sawyer.
12 Evidently it started out with -- this is the wrong
13 figure. The right figure is what's been crossed
14 out. And it got to 191. It was 132.

15 Q. So the actual population was 191 on the
16 day of the inspection?

17 A. I believe so. It was less than 263.
18 That's still past 132. Way past 132. 60. And I
19 talked to Pam and she said, "We just don't have
20 anywhere to put them."

21 Q. On the next page down you've got some
22 notes. The facility is overcrowded?

23 A. Right.

24 Q. Does not meet square footage or
25 toilet/shower requirements.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 A. Right. This is the shower nibs that I
2 spoke of earlier.

3 Q. And down below farther you note that
4 there's not enough staff to properly supervise the
5 inmates?

6 A. Right.

7 Q. And on the next-to-last page you've got
8 some notes. You note that inmates are being very
9 destructive.

10 A. Uh-huh. Right.

11 Q. And you say, basically, it's the
12 current staff's inability to supervise the increased
13 population?

14 A. Right.

15 Q. What type of thing did you see that
16 made you -- that told you they were being
17 destructive?

18 A. Breaking off parts of showers. Tearing
19 up tile. Doing things that -- it's interior. And
20 it's talking about conditions of confinement. The
21 conditions wasn't suitable for their reasonable
22 habitat, so they get frustrated and they start being
23 destructive, just tearing up government property.

24 In some cases flood -- okay. Attempted
25 to start fires in some of my jails. I'm not sure

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 about this one. But some of the cases in the past
2 have been stopping up toilets, flooding jail cell
3 areas. So all that's being destructive. They don't
4 have to just tear something up, but they can cause
5 something to malfunction. And this is a 22-year-old
6 jail.

7 Q. Yeah. In your summary you note that
8 Coffee County has outgrown this 22-year-old jail.

9 A. Uh-huh.

10 Q. And under "Classification" you put: No
11 space available to female inmates are being housed
12 in unauthorized --

13 A. Nonsecure area. I don't remember
14 exactly where, but -- this is evidently true. But,
15 you see, when they're put -- they're supposed to
16 have sight and sound separation. Okay. That's
17 No. 1. No sight, no sounds between male inmates.

18 But in older jails they might have
19 sight separation but they don't have sound
20 separation. Well, it's no real big thing. But when
21 you start talking about putting them where that they
22 can move -- when they move from one area to the
23 other and they can almost reach out and touch
24 someone, that's not -- that's a biggie.

25 And so the reason why I put that -- I

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 don't know exactly where it was. I'd have to, you
2 know, go back to the jail now because all these
3 different jails it's confusing trying to remember.
4 But if I say it's so, it's so. You know, it's
5 nonsecured and due to overcrowding they have to put
6 them somewhere.

7 But there's still supposed to be one
8 female on each shift to properly supervise the
9 safety of the female inmates. You see? Now, I
10 think that's happening, but they're still -- they
11 should be set somewhere else in the facility, which
12 is not possible, away from males.

13 Q. Let me ask you. Exhibit No. 1 and
14 No. 2, the reports, those are reports that you
15 prepared in the course of your duties?

16 A. Right.

17 Q. And these are true and accurate copies
18 that you produced pursuant to a subpoena?

19 A. Right.

20 Q. Mr. Hanna, I'm going to hand to you
21 what's been marked for purposes of identification as
22 Exhibit No. 3.

23 (Whereupon, the previously mentioned
24 document was marked Exhibit No. 3.)

25 Q. (BY MR. BAUM) The front cover is an

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 October 27th, 2005 letter from Mr. Abston to Sheriff
2 Graves. And then that second page, it looks like
3 you did an inspection of the Coffee County Jail on
4 October 25th, 2005?

5 A. Uh-huh.

6 Q. And this is one of the things I noticed
7 where the capacity of the beds was different than
8 what you had seen.

9 A. I think they were using a drunk tank,
10 and you can't use a drunk tank for jail capacity so
11 I took care of that.

12 Q. And on the date of this inspection --
13 I'm looking at the fourth page down -- the capacity
14 at the Coffee County Jail was for 131 beds?

15 A. Right.

16 Q. And the population on the day of
17 inspection was 155?

18 A. Right.

19 Q. And it looks like the staff had
20 increased at this time?

21 A. Okay. From how many?

22 Q. Well, from the previous reports it
23 looks like there was 16 and now we've got 20.

24 A. 20.

25 Q. I'm not sure what that "X" over by

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 "part-time" means.

2 A. No part-time.

3 Q. Okay.

4 A. Okay. I see that they hired three.

5 Three new hires.

6 Q. Down near the bottom you've got a note
7 about money being approved to renovate the doors and
8 locks?

9 A. Right. Cornerstone was the provider.

10 Q. Looking at the last page under your
11 summary, you note the medical receipt system was
12 established and the medical protocol was assigned to
13 the nurse.

14 A. Right.

15 Q. What does that mean?

16 A. Well, medical -- when we go into the
17 medical section of a jail, we try to establish how
18 the medication is being passed out to the inmates.
19 Okay. Officers are not allowed to make up
20 medications. They're only allowed to give it out.
21 But some jails it doesn't work like that. So if it
22 doesn't, then that means that is prepackaged over
23 here from the nurse and the doctor and then it's
24 given out to them. That's good.

25 And then, also, if they've got a

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 doctor's medical protocol assigned to the nurse,
2 like I mentioned earlier, then that's good. They
3 didn't have it per se the previous inspection, but
4 they did this time.

5 So all those things -- they tried to
6 straighten up their act, so to speak. And that's
7 the reason why -- you know, they repaired the locks.
8 But, see, the ADP calculation, official census,
9 which reduced the count, so I didn't see any other
10 reason to present to the board and the board say,
11 okay, let's go ahead on and certify it. But, now,
12 square footage is still being compromised because
13 they've still been overcrowded with state inmates.

14 Q. You say the medical protocol.

15 A. Right.

16 Q. Prior to this inspection there had not
17 been a medical protocol?

18 A. They had one, but it was just a
19 haphazard thing that they were using. Now, I said
20 you need one issued from a doctor assigned to the
21 jail.

22 Q. And as part of that medical protocol
23 there would be emergency --

24 A. Processes for emergencies that arise in
25 the jail throughout the inmate population.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 Q. And do you recall, prior to this
2 inspection, did they have such an emergency
3 procedure?

4 A. Yeah. They had one. I don't know how
5 effective it was, but they had one. I can't tell
6 you -- I can't go into that. But when we start
7 talking about 14-day physicals that are supposed to
8 be done and then a person's got -- you can get into
9 a deliberate indifference if you're not careful, if
10 you deny them of their acute medical needs. Of
11 course, indifference, you know, goes a lot of
12 different ways, but that could be a biggie.

13 Q. And, again, this report on Exhibit
14 No. 3 is one that you prepared in the ordinary
15 course and scope of your employment?

16 A. Right.

17 Q. And this is a true and accurate copy?

18 A. (Witness moves head up and down.)

19 Q. Mr. Hanna, I'm going to hand to you
20 what's been marked for purposes of identification as
21 Exhibit No. 4.

22 (Whereupon, the previously mentioned
23 document was marked Exhibit No. 4.)

24 Q. (BY MR. BAUM) It begins with a letter
25 from Mr. Abston, June 12th, 2006. Does this appear

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 to be an Inspection Report that you prepared
2 June 5th of 2006?

3 A. It seems like, yes.

4 Q. Looking at the third page down, you got
5 it marked that it was overcrowded with county
6 prisoners and a plan was required?

7 A. Oh, okay. Right. Plan required.
8 Right.

9 Q. And down a little bit you've made a
10 note: There needs to be one operable shower per
11 every 16 inmates.

12 A. This is the shower that we were talking
13 about. It seemed like they -- it wasn't there.

14 Q. And looking at the last page, when you
15 inspected the Coffee County Jail on June 5th, 2006,
16 the number of beds was still 131?

17 A. Right.

18 Q. And the population on the day of
19 inspection was 234?

20 A. Right.

21 Q. And the average daily population had
22 been 183.2?

23 A. Right. State inmates were 41,
24 subtracted from 234. Yes. The ADP that we speak
25 of.

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 but at the workhouse I administered to the needs of
2 the inmates and family, friends, loved ones. Took
3 care of their needs, family. I did that for a
4 couple of years. Then I came to the Criminal
5 Justice Center and worked 16 years.

6 Q. What did you do at the federal level?

7 A. In the federal? Took care of federal
8 inmates at Opportunity House over on 100 Oaks Drive
9 for two years.

10 Q. I think I'm just about done. Let me
11 just take a fast look here.

12 MR. BEEMER: Do you want to take a
13 break while you look at your notes?

14 MR. BAUM: I just want to run through
15 this one document. Yeah. We might as well take
16 five minutes.

17 (Whereupon, a recess was taken from
18 11:27 a.m. until 11:34 a.m.)

19 Q. (BY MR. BAUM) Just a few questions.
20 On Exhibit No. 8, looking at the second paragraph of
21 the November 8th, 2004 letter to Sheriff Graves.

22 A. Uh-huh.

23 Q. Down at the bottom of that paragraph
24 you told them that there was possible litigation if
25 family members claim an inmate received inadequate

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 medical or mental health care?

2 A. Yeah. That's possible. And then, of
3 course, like I say, anytime I put something of this
4 nature out, the possibility is always there. It's
5 according to like how you feel and what are you
6 going to do about it. If you know something and
7 don't do anything about it, you're right back where
8 you started. So if you know it's going to happen
9 and they've been told, then why do you stand back
10 and let things happen. That's what this was all
11 about.

12 Q. Are you familiar with any of the county
13 commissioners in Coffee County, Tennessee?

14 A. Ray Johnson. I know him. We talk back
15 and forth from time to time.

16 Q. Why I was asking, I've heard that one
17 of the county commissioners has made the comment
18 that if he had his way, inmates would not receive
19 any medical care unless they paid for it themselves.

20 A. I haven't heard that. Now, in Wilson
21 County Sheriff Ash, Terry Ash, we go way back. I
22 was called to ask to what extent do we charge for
23 medical care. I said, well, it's your duty to
24 provide for basic needs up to a point. Then when it
25 gets to be exploratory or anything else, you need to

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 it's on No. 10, the -- I guess 9. That's the annex.
2 This is the jail. It's No. 10. I believe that's
3 the August 13th of 2003 inspection of the Coffee
4 County Jail.

5 A. Uh-huh.

6 Q. I'm looking at your Annual Jail Data
7 Profile.

8 A. Okay.

9 Q. And over to the right, a quarter of the
10 page down you've got type and number of inmates.
11 Correct? In the shaded area.

12 A. Right.

13 Q. And typically when you add these up,
14 the numbers will add up to the population on the day
15 of inspection, correct?

16 A. Right.

17 Q. And if I add 90 locals to 82 pretrial,
18 I come up with 172, correct?

19 A. (Witness moves head up and down.)

20 Q. And it's showing the population the day
21 of inspection as 127.

22 A. I don't know -- I don't think this is
23 accurate as far as these numbers are concerned.

24 Q. How do you know the 127 was accurate?

25 A. That's what I'm saying. I don't think

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425

1 this is accurate. Whatever the figures over here,
2 it should be over here.

3 Q. Now, this document, if you turn to the
4 next page, the information for this inspection was
5 provided by Sergeant Beaty, correct?

6 A. Right.

7 Q. And typically you're dealing with
8 Lieutenant Freeman?

9 A. Yeah. I know. Right. Captain now.
10 But at this time I think she was on vacation or
11 whatever, and if I'm not mistaken, he gave me the
12 figures. And that's where the problem is, because
13 he's just the maintenance man. Do you know Charles
14 Beaty? Yeah. Do you know Charles Beaty? So that
15 could be the case, but I have to go by what they
16 give me.

17 Q. And they've got down there on that
18 Annual Jail Data Profile, he's got seven new hires
19 since last inspection?

20 A. Okay. Not exactly accurate.

21 Q. So there could be some inaccuracies on
22 this document?

23 A. Right. On this one. But it probably
24 got straightened up on the next one.

25 MR. BAUM: Okay. I don't have anything

Reporter: LaVonne Cleeton, RMR, CRR
Phone: (615) 255-6425